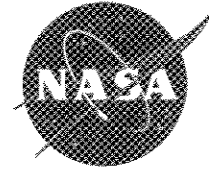


National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



June 17, 2011

Reply to Attn of General Law Practice Group

TO: Distribution

FROM: Agency Designee

SUBJECT: Approval for NASA Employees with Senior Institutional or Project Responsibilities to Attend a Series of Events in Conjunction with the Paris Air Show on June 19 – 26, 2011

In accordance with 5 C.F.R. § 2635.204(g)(2) and (3), I make the following determination:

A number of NASA employees with senior institutional or project responsibilities<sup>1</sup> have been invited to attend the 2011 Paris International Air Show and a number of events collateral to the Air Show. These events include receptions on June 19th and 20th, 2011 by the State of Alabama at the Eiffel Tower; Alliant Techsystems (ATK) "Tea at the Ritz"; the South Carolina Department of Commerce at the Hotel de Talleyrand; the United Technologies Corporation at Quai d'Orsay; and Aerospace Industries Association (AIA)/ATK lunch at the AIA Chalet at the Paris Air Show. The events are sponsored by the Chamber of Commerce of Huntsville/Madison County; City of Huntsville; Huntsville International Airport; Madison County Commission; North Alabama Industrial Development Association; the Tennessee Valley Authority; Aerojet; Bradley Arant Bould Cummings; Ducommun Miltec; Teledyne Brown Engineering, Inc; United Space Alliance; ATK; the South Carolina Department of Commerce; the South Carolina Governor, Nikki Haley; Michelin; The Boeing Company; Lockheed Martin; the French-American Foundation; and the United Technologies Corporation. In a separate determination, I found that the events meet the requirements of "widely attended gatherings" as defined in 5 CFR § 2635.204(g)(2) and those whose duties do not substantially affect the sponsors may accept free attendance.

Many of the event sponsors are contractor companies or associations whose members are comprised of such companies that are currently involved in aeronautics programs and contractual matters relating to NASA. Some NASA personnel attending this event have duties that may substantially affect the interests of the event sponsors. These personnel are similarly situated in that they each have senior institutional or project responsibilities that could significantly influence current or future matters with these entities.

---

<sup>1</sup> Personnel include Dr. Jaiwon Shin, Associate Administrator, Aeronautics Research Mission Directorate (ARMD); Mr. Thomas Irvine, Deputy Associate Administrator, ARMD; Mr. Michael Hette, Executive Officer to the Associate Administrator, ARMD; Mr. Akbar Sultan, Technical Integration Manager, ARMD; and Mr. Jon Montgomery, Director, Mission Support for ARMD.

I have determined that free attendance of these senior institutional and project leaders at the various events is in the interests of the Agency because it will further Agency programs and operations. The events allow discussions regarding NASA's Vision and its current and future aerospace programs with a wide variety of domestic and international partners. The events will help to raise NASA's profile in the international community and will support NASA's statutory mandate to disseminate information concerning its activities.

The total per-person cost for the five events combined is estimated at around \$457. Given the purpose of the events, the unique opportunity the events provide to communicate with the international and domestic aerospace communities, the broad attendance anticipated, and the modest market value of these events considering the foreign location, I have determined that the value to the agency in having these senior institutional and project leaders attend the events outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties.

Questions about this determination may be addressed to Katie Spear at (202) 358-0394.

A handwritten signature in black ink, appearing to read 'Adam F. Greenstone', with a stylized, flowing script.

Adam F. Greenstone